

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND)
Plaintiff,)
v.)
PYTKO CONSTRUCTION CORP.)
Defendant,)
C.A. No. 04cv12001NMG

MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR SUMMARY JUDGMENT

Now comes the Plaintiff and requests an extension of time to file a Motion for Summary Judgment from July 15, 2005 to July 22, 2005. This action is for collection of delinquent contributions to an ERISA employee benefit fund, and Defendant has proposed a payment schedule. Additional time is necessary to coordinate a potential settlement of this matter.

Dated: July 15, 2005

Respectfully submitted,

Catherine M. Campbell
BBO #549397629444
Feinberg, Campbell & Zack, P.C.
177 Milk Street
Boston, MA 02109
(617) 338-1976

/s/ Catherine M. Campbell
Attorney for Plaintiff

Certificate of Service

I, Catherine M. Campbell, hereby certify that I caused a copy of the foregoing to be mailed this day by U.S. first-class mail to Roger Leboeuf, Healdon Association, 58 Weybosset St., Suite 606, Providence, RI 02903.

/s/Catherine M. Campbell
Catherine M. Campbell